

Attorney for Plaintiff  
DIANNA JOUAN

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Attorneys for Defendant  
THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY  
(erroneously sued as “THE LELAND STANFORD JR. UNIVERSITY”)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DIANNA JOUAN, an individual	)	CASE NO. 5:22-CV-03779-NC
	)	
Plaintiff,	)	<b>STIPULATION RE: DISCOVERY PLAN</b>
	)	<b>FOLLOWING HEARING TO MODIFY</b>
vs.	)	<b>SCHEDULING ORDER</b>
	)	
THE LELAND STANFORD JR.	)	
UNIVERSITY a California corporation; and	)	
DOES 1 through 10, inclusive,	)	
	)	
Defendants.	)	Complaint Filed: June 27, 2022
	)	FAC Filed: August 16, 2022
	)	SAC Filed: March 1, 2023

Plaintiff DIANNA JOUAN (“Plaintiff”) and Defendant THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY (erroneously sued as “THE LELAND STANFORD JR. UNIVERSITY”) (“Defendant”) (collectively, the “Parties”) hereby stipulate and agree as follows:

Whereas, the Parties attended the Hearing to Modify the Scheduling Order (“Hearing”) on September 27, 2023;

Whereas, as a result of the Hearing, the Court agreed to extend the fact discovery deadline to November 17, 2023;

Whereas, although all other deadlines remain set, the Court invited the Parties to submit a stipulation regarding a revised discovery plan and deposition schedule to the Court to help streamline outstanding discovery efforts;

Whereas, the Parties understand that some limited modifications to the below schedule may be necessary to accommodate witness availability/ timing and intend to meet and confer as necessary;

Whereas, the Parties also intend to continue to engage in efforts to resolve the case by way of mediation and/or other facilitated settlement discussions through alternative dispute resolution options;

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that, the proposed discovery plan is as follows:

<b><u>Depositions</u></b>	<b><u>Proposed Dates</u></b>
Hina Qureshi Jesslyn Rumbold	October 9, 2023
Linda Usoz	October 11, 2023
Yun-Ting Yeh	October 13, 2023
Erin Campbell	October 17, 2023
Ruth Reyes Johnson	October 19, 2023

<b><u>Depositions</u></b>	<b><u>Proposed Dates</u></b>
Garry Gold	October 24, 2023
Dianna Jouan	November 7, 2023
Deitria Chapman Ludivine Freeze	November 10, 2023

Pursuant to Local Rule 5-1(h)(3) the filer of this document attests that concurrence in the filing of the same has been obtained from each of the signatories.

Dated: October 2, 2023

**QUINTANA HANAFLI, LLP**

By: /s/ Rory C. Quintana  
**RORY C. QUINTANA**  
Attorneys for Plaintiff  
**DIANNA JOUAN**

Dated: October 2, 2023

**GORDON REES SCULLY MANSUKHANI, LLP**

By: /s/ Sara A. Moore  
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**THE BOARD OF TRUSTEES OF THE**  
**LELAND STANFORD JUNIOR UNIVERSITY**